

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>JOHN AND JANE DOE NO. 1, et al.,</b>	:	<b>CASE NO. 3:22-cv-00337</b>
	:	
<b>Plaintiffs,</b>	:	<b>JUDGE MICHAEL J. NEWMAN</b>
	:	
<b>vs.</b>	:	
	:	
<b>BETHEL LOCAL SCHOOL DISTRICT BOARD OF EDUCATION, et al.,</b>	:	<b>PLAINTIFFS' MOTION TO REDUCE THE RULE 11 SAFE HARBOR DEADLINE</b>
	:	
<b>Defendants.</b>	:	

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Plaintiffs, pursuant to Local Rule 7.1(b)(3), hereby request that the Court consider this motion early due to its urgent nature and the risk of prejudice that Rule 11's default 21-day safe harbor provision may cause, given the expedited nature of current briefing.

Plaintiffs, pursuant to Fed. R. Civ. P. 11(c)(2), hereby move this Court to adjust the safe harbor period in relation to Plaintiff's Rule 11 Motion served on February 18, 2023, such that it shall end on March 6, 2023 instead of March 16, 2023.<sup>1</sup> The reasons for this motion are set forth more fully in the attached Memorandum in Support.

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<sup>1</sup> Plaintiffs served by email on February 17, 2023 and by mail on February 18, 2023. Rule 11(c)(2) provides 21 days, which falls on March 11. Rule 5 and 6(d)'s mail rule extends the safe harbor until March 16, 2023.

Dated: February 24, 2023

Respectfully submitted,

s/ Joseph P. Ashbrook  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of February 2023, I served a copy of the foregoing via the Court's ECF system, which notifies all counsel of record.

s/ Joseph P. Ashbrook  
Joseph P. Ashbrook